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17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.
23 **PLAINTIFF WAYMO LLC'S
24 ADMINISTRATIVE MOTION TO FILE
25 UNDER SEAL PORTIONS OF ITS
26 LETTER BRIEF TO COMPEL
27 PRODUCTION OF MATERIALS
28 WITHHELD BY ANTHONY
LEVANDOWSKI UNDER THE FIFTH
AMENDMENT AND EXHIBITS 3, 4, AND
5 THERETO**

29 UBER TECHNOLOGIES, INC.;
30 OTTOMOTTO LLC; OTTO TRUCKING
31 LLC,

32 Defendants.

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1 Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests
 2 to file under seal information in its Letter Brief to Compel Production of Materials Withheld by
 3 Anthony Levandowski Under the Fifth Amendment (the “Letter Brief”) and exhibits 3, 4, and 5
 4 thereto, filed concurrently herewith. Specifically, Waymo requests an order granting leave to file
 5 under seal the portions of the documents as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Letter Brief	Highlighted in Blue	Defendants
Exhibits 3, 4, and 5	Entire Documents	Defendants

9 **I. LEGAL STANDARD**

10 Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or
 11 portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under
 12 the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored
 13 to seek sealing only of sealable material.” *Id.*

14 **II. UBER’S CONFIDENTIAL INFORMATION**

15 Waymo seeks to seal the portions of the Sur-Reply and supporting exhibits only because
 16 Defendants have designated the information confidential and/or highly confidential. Declaration of
 17 Patrick Schmidt (“Schmidt Decl.”) ¶ 3. Waymo expects Defendants to file one or more declarations
 18 in accordance with the Local Rules.

19 **III. CONCLUSION**

20 In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the
 21 above listed documents accompany this Administrative Motion. For the foregoing reasons,
 22 Waymo respectfully requests that the Court grant Waymo’s Administrative Motion.

23 DATED: June 12, 2017

24 QUINN EMANUEL URQUHART & SULLIVAN,
 25 LLP

26 By /s/ Charles K. Verhoeven

27 Charles K. Verhoeven
 28 Attorneys for WAYMO LLC